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10 Las Vegas Metropolitan Police Department,
11 Sheriff Joseph Lombardo, and Officer Brandon
12 Prisbrey

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MANUEL GARCIA,

Plaintiff.

VS.

CLARK COUNTY SHERIFF'S OFFICE, JOE
LOMBARDO, BRANDON PRISBREY,
#9315, SUNRISE MEDICAL HOSPITAL,
SUSANNE ROOZENDAAL.

Defendants.

CASE NO. 2:17-cv-2504-APG-BNW

**STIPULATION AND ORDER TO
EXTEND THE DEADLINE FOR THE
FILING OF DISPOSITIVE MOTIONS**

FIRST REQUEST

Pursuant to LR 6-1 and LR 26-4, the parties, by and through their respective counsel of record, hereby stipulate and request that this Court extend the deadline to file dispositive motions in the above-captioned case thirty (30) days, up to and including Friday, May 1, 2020.

This Request for an extension of time is not sought for any improper purpose or other purpose of delay. This request for extension is based upon the following:

The parties have agreed to take the depositions of two final witnesses after the discovery cutoff in order to accommodate the witness' schedules. These two depositions are scheduled for and will be completed on or before Wednesday, March 18, 2020. This short extension will allow the parties enough time to obtain the necessary transcripts prior to preparing their dispositive motions.

1 WHEREFORE, the parties respectfully request that this Court extend the time for the
2 parties to file their dispositive motions by thirty (30) days from the current deadline of April 1,
3 2020 up to and including May 1, 2020.

4 DATED this <u>11th</u> day of March, 2020.	DATED this <u>11th</u> day of March 2020.
5 LAW OFFICE OF DAN M. WINDER <u>/s/ Dan C. Winder</u> DAN M. WINDER, ESQ. Nevada Bar No. 1569 3507 W. Charleston Blvd. Las Vegas, Nevada 89102 Attorneys for Plaintiff Manuel Garcia	LEWIS BRISBOIS BISGAARD SMITH LLP <u>/s/ Robert W. Freeman</u> ROBERT W. FREEMAN, ESQ. Nevada Bar No. 03062 6385 S. Rainbow Boulevard, Suite 600 Las Vegas, Nevada 89118 Attorneys for Defendants Las Vegas Metropolitan Police Department, Sheriff Joseph Lombardo, and Officer Brandon Prisbrey
11 DATED this <u>11th</u> day of March, 2020.	
12 CARROLL, KELLY, TROTTER, FRANZEN, McBRIDE <u>/s/ Chelsea R. Hueth</u> Robert C. McBride, Esq. Nevada Bar No. 7082 Chelsea R. Hueth, Esq. Nevada Bar No. 10904 8329 W. Sunset Road, Suite 260 Las Vegas, Nevada 89113 Attorneys for Defendant Suzanne Rozendaal, D.O.	

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20 **IT IS SO ORDERED**

21 **DATED: March 13, 2020**

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25 **BRENDA WEKSLER**
26 **UNITED STATES MAGISTRATE JUDGE**